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4 **UNITED STATES DISTRICT COURT**
5 **DISTRICT OF NEVADA**

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7 **IN RE: WAL-MART WAGE AND HOUR**
8 **EMPLOYMENT PRACTICES**
9 **LITIGATION**

MDL 1735

Docket No. 2:06-CV-00225-PMP-PAL
(BASE FILE)

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11 **THIS DOCUMENT RELATES TO ALL**
12 **CASES EXCEPT KING v.**
13 **WAL-MART STORES, INC., CASE**
14 **NO. 07-1486-WY**

DATE: October 19, 2009

15 **DECLARATION OF AMANDA J. MYETTE RELATING TO ADDITIONAL**
16 **ADMINISTRATIVE COSTS DURING APPEAL**

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18 I, Amanda J. Myette, declare as follows:

19 1. I am a Project Manager for Rust Consulting, Inc. ("Rust Consulting"). My
20 business address is 625 Marquette Avenue, Suite 880, Minneapolis, Minnesota 55402-2469. My
21 telephone number is 612-359-2022. I am over twenty-one years of age and authorized to make
22 this declaration on behalf of Rust Consulting and myself.

23 2. Rust Consulting has extensive experience in class action matters, having provided
24 services in class action lawsuits involving employment discrimination, employment wage and
25 hour, antitrust, securities fraud, property damage, product liability, insurance and consumer
26 issues. We have provided notification and/or claims administration services in more than 2,500
27 class action cases. Of these, more than 750 were labor & employment cases.

5. Rust Consulting was requested by Plaintiffs' Co Lead Counsel Robert Bonsignore to estimate the additional costs that may be incurred due to possible delays in the distribution of settlement proceeds. I have consulted others at Rust Consulting to determine our best estimate of these potential costs. We estimate that a delay of 9-24 months would cause approximately \$200,000 of additional administration costs, or approximately \$100,000 per year. These costs would include telephone support and minimal project management. This is an estimate and the actual costs of additional administration may vary depending upon the ultimate timetable and services provided.

25 Executed this 9th day December 2009, in Minneapolis, Minnesota.

DECLARATION OF AMANDA MYETTE
NO. 2:06-cv-00225-pmp-pal